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EXPRESS MAIL
RETURN RECEIPT REQUESTED

February 8, 1988

William L. Warren, Counsel
Steering Committee
Cohen, Shapiro, Polisher, Sheikman & Cohen
112 Nassau Street - P.O. Box 645
Princeton, New Jersey 08542

Re: Scientific Chemical Processing (SCP) Site
Paterson Plank Road, Carlstadt, New Jersey

Dear Mr. Warren:

I am writing to express our concern about the progress of the Remedial Investigation and Feasibility Study (RI/FS) work which is presently underway for the SCP Carlstadt site.

As you are aware, these studies were initiated pursuant to the terms of a Consent Order which this Agency and 108 potentially responsible parties (PRPs) for this site executed in September 1985. That Order required that the RI studies be completed and that a draft RI Report be submitted to EPA by November 1987. These studies have not yet been completed nor is it likely that the RI Report will be submitted to EPA before April 1988 at the earliest.

We recognize that some delay has been caused by the need for special site studies, e.g., the clay lens sampling, which became apparent only after some RI work had been done. We also appreciate the fact that some aspects of the RI work were delayed by the problems encountered in the analysis of site soil samples.

There are, however, a number of measures which can and, in our view, must be undertaken in the very near future in order to expedite completion of the RI work and some of the other activities required by the Order. These are as follows:

1. The eight (8) offsite wells which were initially discussed with you on November 5th and November 12th, 1987, and which were discussed with your consultants on a number of occasions since then, must be installed as soon as possible. The data from these wells is essential for a proper site assessment as required in the RI Report. (It is our understanding that, although your technical staff agrees with

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the need for these wells, they are still awaiting approval and funding from the Steering Committee to facilitate their installation);

2. The screening of options for the remediation of onsite contamination should begin immediately and should not await the completion of the RI Report. (It is our understanding, based upon our discussions with you and your consultant(s) at and after the Technical Committee meeting on January 7, 1988, that this work has already commenced; as per the agreement at that meeting, we expect that this screening will be completed and that a Report summarizing the results will be submitted to EPA by March 31, 1988);
3. The draft RI Report for the site should be submitted to the Region before April 30, 1988, as was proposed in the revised schedule which your consultant submitted to EPA earlier this year; and
4. A Feasibility Study focusing on remediation of onsite contamination should start as soon as your consultants receive the results of the site soil analyses. (Your consultants indicated that this data would be received by the third week in February 1988; we, therefore, expect that the onsite Feasibility Study will be completed within twelve (12) weeks after receipt of this data, which schedule is in accord with the time frame for the Feasibility Study work as proposed in both the Site Operations Plan and the revised schedule which your consultant submitted to EPA earlier this year).

It is requested that you, as Counsel to the Steering Committee, bring to their attention the fact that the work required by the Order has fallen behind schedule and that the Region is looking forward to having all of the remaining work proceed without delay. We will provide as much assistance as our own resources allow in order to achieve this objective.

Please be advised that the dates referred to above reflect the Region's expectations with regard to this matter. They are neither intended to be nor are they a modification of any of the terms, provisions, deadlines or any other clauses contained in the Order.

If you would like to discuss this matter in any further detail, please contact me at (212) 264-9897 at your earliest convenience.

Sincerely,

James P. Rooney
Office of Regional Counsel

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